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6 Attorneys for Defendants  
SYNAPSENSE CORPORATION AND PANDUIT  
CORPORATION  
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8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10 LOS ANGELES DIVISION

11 GROUNDWELL TECHNOLOGIES,  
12 INC., a Delaware corporation,

13 Plaintiff,

14 v.

15 SYNAPSENSE CORPORATION, a  
Delaware corporation and PANDUIT  
16 CORP., a Delaware corporation,

17 Defendants.  
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CASE NO. 2:15-cv-06024

**STIPULATION FOR  
CONTINUANCE OF SCHEDULING  
CONFERENCE**

McDERMOTT WILL & EMERY LLP  
ATTORNEYS AT LAW  
MENLO PARK

1 WHEREAS, Plaintiff Groundswell Technologies, Inc. ("Plaintiff") filed the  
 2 Complaint in this instant action in the Central District of California on August 7,  
 3 2015:

4 WHEREAS, the Court has scheduled a Rule 16 Scheduling Conference on  
 5 April 18, 2016, with Rule 26(f) reports due on April 4, 2016;

6 WHEREAS, Counsel for Defendants are unable to appear for the Scheduling  
 7 Conference scheduled for April 18, 2016 due to scheduling conflicts and  
 8 professional obligations.

9 IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

10 1) The parties jointly request that the Court continue the Rule 16 Scheduling  
 11 Conference in this matter to be held on May 2, 2016, or thereafter, per the Court's  
 12 convenience;

13 2) The parties jointly request that the Court extend the deadline for filing a  
 14 Rule 26(f) Report according to the new date for Rule 16 Scheduling Conference.

15  
 16 Dated: April 1, 2016

NI, WANG & MASSAND, PLLC

17 By: /s/ Hao Ni

18 Hao Ni

19 Attorneys for Plaintiff,  
 GROUNDSWELL  
 TECHNOLOGIES, INC.

20  
 21 Dated: April 1, 2016

McDERMOTT WILL & EMERY LLP

22 By: /s/ Nitin Gambhir

Nitin Gambhir

23 Attorneys for Defendants,  
 24 SYNAPSENSE CORPORATION and  
 PANDUIT CORPORATION

**SIGNATURE ATTESTATION**

Pursuant to Civil L.R. 5-4.3.4, I hereby attest that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request.

/s/ Nitin Gambhir  
Nitin Gambhir

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on April 1, 2016 to all counsel of record who are deemed to have consented to electronic service via the Court’s CM/ECF system per Civil Local Rule 5.4. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Nitin Gambhir  
Nitin Gambhir